

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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19 RECORDINGS LIMITED,

Plaintiff,

v.

14-CV-1056 (RA) (GWG)

SONY MUSIC ENTERTAINMENT,

ECF CASE

Defendant.

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**DECLARATION OF DOUGLAS S. CURRAN**

I, **DOUGLAS S. CURRAN**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member in good standing of the bar of this Court and an attorney at Covington & Burling LLP, counsel to defendant Sony Music Entertainment (“SME”) in the above-captioned matter. I make this declaration in support of SME’s Opposition to Plaintiff’s Motion for Leave to Amend, to place before the Court documents and information necessary for its determination of this motion.

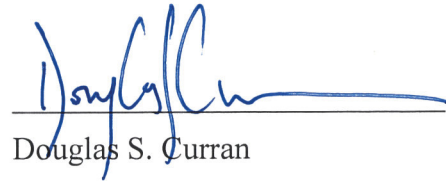
2. Attached as Exhibit A is a true and correct copy of the transcript from the hearing held in this matter on May 1, 2015, before Judge Abrams.

3. Attached as Exhibit B is a true and correct copy of a redline comparison between 19’s Proposed Second Amended Complaint (Dkt. 65-1) and 19’s First Amended Complaint (Dkt. 18).

4. Attached as Exhibit C is a true and correct copy of Plaintiff’s First Set of Requests for Production of Documents to Defendant, served on SME on June 22, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2, 2015, in New York, New York.



Douglas S. Curran